

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

STEWART ABRAMSON,

individually and on behalf of a class
of all persons and entities similarly
situated,

Plaintiff,

v.

**LINE 5, LLC; HEADSTART
WARRANTY GROUP LLC; and MLB
GLOBAL, LLC d/b/a BENCHMARK
WARRANTY,**

Defendants.

Case No. 2:25-cv-00288-PLD

**NOTICE OF MOTION OF DEFENDANT HEADSTART WARRANTY
GROUP LLC'S TO DISMISS PLAINTIFF'S CLASS ACTION
COMPLAINT PURSUANT TO FED. R. CIV. P. 12(b)(1)**

PLEASE TAKE NOTICE that upon the annexed Memorandum of Law and upon all the prior pleadings and proceedings had herein, Defendant Headstart Warranty Group LLC will move this Court, located at the Joseph F. Weis, Jr. U.S. Courthouse, 700 Grant Street, Pittsburgh, Pennsylvania 15219, pursuant to Fed. R. Civ. P. 12(b)(1), to dismiss or transfer this action pursuant to the first-filed rule as the present action asserts nearly identical claims as an earlier filed class action in the

Middle District of Pennsylvania styled *Friel v. Line 5, LLC; Headstart Warranty Group LLC and JEA Management Services d/b/a Covered Auto*, Case NO. 3:24-cv-1866-JKM (M.D. Pa.). A proposed form of order accompanies this motion.

Dated: July 3, 2025

Respectfully submitted,

MESSER STRICKLER BURNETTE, LTD.

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